

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,  
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI  
NC, LLC, RED ROOF  
FRANCHISING, LLC, RRI WEST  
MANAGEMENT, LLC, VARAHI  
HOTEL, LLC, WESTMONT  
HOSPITALITY GROUP, INC., and  
RRI III, LLC,

Defendants.

**PL Sum. J.**

**Ex. 078**

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF M.M.'S OBJECTIONS AND RESPONSES TO  
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff M.M. (“M.M.” or “Plaintiff”) hereby provides objections and responses to Defendant Red Roof Inns, Inc.’s First Interrogatories (the “Interrogatories”). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court’s June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

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for pictures and videos, some of which he took when she was unaware. M.M. believes that Gerald would drug her, causing her to lose consciousness.

From 2008 through about 2018, M.M. was trafficked off and on by four other men. First was [REDACTED], starting about 2008. [REDACTED] kept all the money M.M. collected from commercial sex.

After she managed to run away from [REDACTED] she met [REDACTED] who was a buyer who had paid \$100 for sex with M.M. He convinced M.M. to move in with him in Norcross. She did. Mr. [REDACTED] quickly became violent and began to traffic M.M. for sex. For example, he broke her ribs and her nose and often threatened her. Other victims of Mr. [REDACTED] included “Lola” and “Jalyssa.” M.M. thinks Mr. [REDACTED] may have let these girls keep some of the money they collected, but he kept all the money M.M. collected. She was then trafficked by [REDACTED] and a man named “T,” identified above in response to Interrogatory No. 9. Both of these traffickers also generally kept all the money she collected.

Her trafficking at the Smyrna RRI likely began in about 2011, after her first child was born and adopted out. She recalls being at this hotel often through 2012, and off and on until about 2017. Her traffickers would take

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was his primary trafficking victim, and his only one until M.M. came along. She also would see a buyer in the office at this hotel, with 2 to 3 other girls at the same time. M.M. does not believe this hotel had a security camera in the front of the hotel during the time she was trafficked there.

The signs of sex trafficking at this hotel were open and obvious. At any given time, while M.M. was trafficked at this hotel, there would be about 10 to 15 other victims also working at this hotel. Each victim saw several buyers a day, meaning that there was an unmistakable excessive volume of male buyers coming in and out of the hotel, including in and out of M.M.'s room, each day. And there were traffickers roaming the halls of the hotel with their victims in tow. The trashcans in M.M.'s room would fill with used condoms that housekeeping staff would notice. And M.M. and other victim would ask for excessive amounts of towels while they were trafficked at this hotel.

M.M. also exhibited additional signs that she was being trafficked. She was wary of looking other men in the eye, because her trafficker would not generally permit that. She also had signs of malnourishment, drug addiction, and physical abuse, including visible bruises.

**INTERROGATORY NO. 13: Please identify and describe in reasonable detail every injury, illness, condition, inability to**

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**VERIFICATION**

The answers set forth in **PLAINTIFF M.M.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This \_\_\_\_ day of August, 2021.

DocuSigned by:  
  
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M.M.